

## Winnegbago Reclamation Service

8403 Lindenwood Road • Rockford, IL 61109 • Tel: (815) 874-4806 • Fax: (815) 874-4630

September 18, 2002



Mr. Bernie Schorle Remedial Project Manager United State Environmental Protection Agency Region V 77 West Jackson Boulevard Chicago, IL 60604-3590

Re: Pagel Facility – Five Review – Historical account of Completion of Closure.

#### Dear Bernie:

On behalf of Winnebago Reclamation Service (WRS) I have provided the following information in response to your request for clarification on the recent closure activities for the North Unit of the Pagel Landfill Facility. In addition, I have also included a response to some of the public comments provided to the USEPA as part of the 5 year review.

The closure of east side of the North Unit (Operable Unit 1) of the Pagel Landfill Facility was initiated in August of 2000 and completed during the first part of July 2001. The actual acceptance report documenting the closure was submitted to the Illinois EPA and USEPA for approval on approximately September 19,2001. Although the acceptance report was not completed until September 2001, the actual letter of submittal was erroneously dated April 27, 2001. There was no submittal to any Agency documenting the closure of the east side of the North Unit prior to the September 2001 submittal. Attachment A includes the information record from the cover pages of the Illinois EPA permit approving the completion of the closure of the eastside of the Pagel North Unit. An explanation of each submittal is also provided in Attachment A.

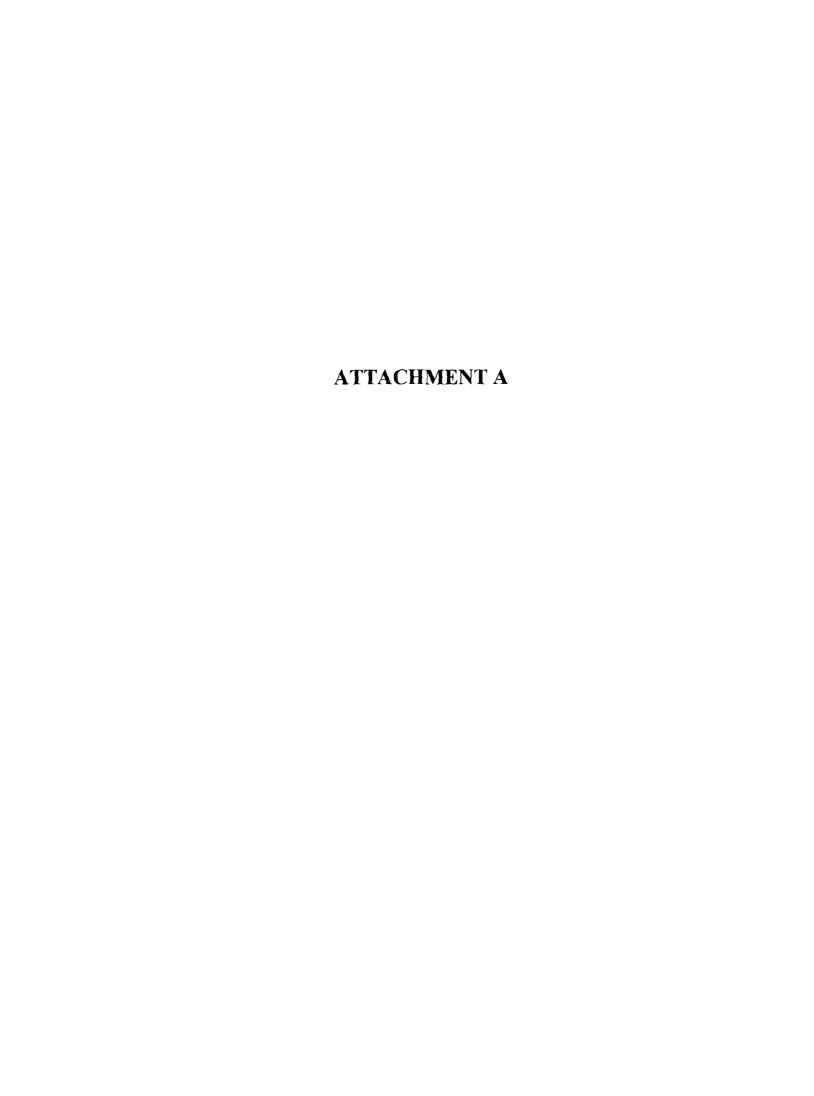
The initial closure of the North Unit consisted of completing the final cover and leachate/gas management system for the westernmost 16.6 acres. The closure was completed during the summer and fall of 1997 and the initial submittal requesting acceptance of the completed closure was submitted to the Illinois EPA and the USEPA on approximately February 23, 1998. The submittal was incorporated into the 5 year renewal of the Illinois EPA operating permit for the Pagel Landfill Facility. The Illinois EPA approved the renewal of the facility operating permit and completion of the closure on June 18, 1998. Attachment B includes the information record from the cover pages of the Illinois EPA approving the completion of closure for the western portion of

the Pagel North Unit.

Sincerely,

Thomas Hilbert

Winnebago Reclamation Service



Description of Submittals for Modification No. 19 to Pagel Landfill Facility Operating Permit Permit No. 1991-138-LF IEPA Log No. 2001-360

Initial submittal for approval of final closure of the eastern portion of the North Unit of the Pagel Landfill was received by the Illinois EPA September 19, 2001.

Waiver of the statutory review deadline was received by the Illinois EPA December 11, 2001

A letter from the County indicating that the original site location approval was not conditioned upon any drawings and that minor changes to design grades are consistent with site location approval was resubmitted to the Illinois EPA on December 28, 2001.

Waiver of the statutory review deadline was received by the Illinois EPA January 17, 2002

Additional information in response to Illinois EPA concerns was submitted on February 5, 2002 (see submittal for details)

Waiver of the statutory review deadline was received by the Illinois EPA March 7, 2002

Additional information in response to Illinois EPA concerns was submitted on March 12, 2002 (see submittal for details)

Waiver of the statutory review deadline was received by the Illinois EPA April 11, 2002

Additional information in response to Illinois EPA concerns was submitted on April 18, 2002 (see submittal for details)

Waiver of the statutory review deadline was received by the Illinois EPA May 16, 2002

Permit approving closure of the North Unit was issued May 31, 2002

### ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276

RENEE CIPRIANO, DIRECTOR

217/524-3300

May 31, 2002

<u>Certified Mail</u> 7001 2510 0002 3280 2438

Winnebago Reclamation Service, Inc. Attention: Gary L. Marzorati 4920 Forest Hills Road Loves Park, Illinois 61111

Re:

2018080001 -- Winnebago County

Winnebago Reclamation Service/[Pagel's Pit]

Permit No. 1991-138-LF Modification No. 19 Log No. 2001-360

Expiration Date: April 15, 2003

Permit File

Dear Mr. Marzorati:

Permit has been granted to Winnebago Reclamation Service, Inc., as owner and operator, approving development and operation of a municipal and non-hazardous special waste landfill, pursuant to 35 Illinois Administrative Code, Subtitle G (hereinafter 35 IAC) Part 813. Final plans, specifications, application, and supporting documents, as submitted and approved, shall constitute part of this permit and are identified in the records of the Illinois Environmental Protection Agency (the "Illinois EPA"), Bureau of Land, Division of Land Pollution Control by the permit number designated in the heading above.

This facility has site boundaries encompassing approximately 235 acres and contains two (2) landfill units (the Southern Unit and the Northern Unit), permitted pursuant to 35 IAC Parts 811, 812, 813 and 814. Permit No. 1991-138-LF, issued on April 5, 1993, approved development of the Southern Unit, which, is designed to handle municipal waste and non-hazardous special waste and it has a waste footprint of approximately 27.5 acres, a waste capacity of approximately 2.43 million cubic yards and a maximum final elevation of 846 feet AMSL. (Modification No. 9 to Permit No. 1991-138-LF approved changes to the design of the Southern Unit such that it now has a waste capacity of approximately 3.14 million cubic yards and a maximum final elevation of 856 ft. AMSL.) On August 22, 1996, Modification No. 2 to Permit No. 1991-138-LF was issued approving the initial significant modification for the Northern Unit, which has a waste footprint of approximately 42.7 acres and is also permitted to accept both municipal waste and non-hazardous special waste. Modification No. 2 to Permit No. 1991-138-LF also approved a vertical expansion of the Northern Unit which increased the permitted airspace of the Northern

Unit by approximately 1.82 million cubic yards and the increased its maximum final elevation to 865 feet AMSL.

Permit modification is hereby granted to Winnebago Reclamation Service, Inc., as owner and operator, approving modification of the municipal solid and non-hazardous special waste landfill all in accordance with the application prepared, signed and sealed by Daniel R. Feezor, P.E. of Feezor Engineering, Inc., signature dated July 19, 2001 for Application Log No. 2001-360. Final plans, specifications, application, and supporting documents, as submitted and approved, shall constitute part of this permit and are identified in the records of the Illinois Environmental Protection Agency (Illinois EPA), Bureau of Land, Division of Land Pollution Control by the permit number/modification number and log numbers designated in the heading above.

Specifically, Modification No. 19 to Permit No. 1991-138-LF approves the following:

- a. the revised final cover design and associated CQA activities,
- b. the operating authorization for the leachate/gas collection system in the Northern Unit,
- c. the revised cost estimates for the Northern and Southern Units, and
- d. the final cover construction acceptance report for the eastern portion of the Northern Unit, as described in Log No. 2001-360.

The application approved by Modification No. 19 to Permit No. 1991-138-LF consist of the following documents:

DOCUMENT	DATE OF DOCUMENT	DATE RECEIVED	
Original Application for Log No. 2001-360	April 27, 2001	September 19, 2001	
Waiver	December 11, 2001	December 11, 2001 (via facsimile)	
Additional Information	December 28, 2001	December 28, 2001 (via facsimile)	
Waiver	January 17, 2002	January 17, 2002 (via facsimile)	
Additional Information	February 5, 2002	February 5, 2002	
Waiver	March 7, 2002	March 7, 2002 (via facsimile)	
Additional Information	March 12, 2002	March 12, 2002	
Waiver	April 11, 2002	April 11, 2002 (via facsimile)	
Additional Information	April 18, 2002	April 18, 2002	
Waiver	May 16, 2002	May 16, 2002 (via facsimile)	

Except for the differences described in the table below, the special conditions of the permit letter for Modification No. 19 to Permit No. 1991-138-LF are identical to the special conditions to Modification No. 18 to Permit No. 1991-138-LF, issued January 9, 2002.

# ATTACHEMENT B

Description of Submittals for Modification No. 6 to Pagel Landfill Facility Operating Permit Permit No. 1991-138-LF IEPA Log No. 1998-001

Initial submittal for approval of request for renewal of operating permit was received by the Illinois EPA January 2, 2001

Illinois EPA/Bureau of Land application form LPC-PA1 was resubmitted to the Illinois EPA January 15, 1998

An addendum amending the initial request for operating renewal was submitted combining the request for acceptance of closure for the western portion of the North Unit of the Pagel Landfill with the request for renewal of the operating permit. The submittal was received by the Illinois EPA on February 23, 2002

Waiver of the statutory review deadline was received by the Illinois EPA April 3, 1998

Revised closure/post-closure care cost estimates was submitted to the Illinois EPA April 3, 1998

Additional information in support of the revised cost estimates was submitted to the Illinois EPA on May 14, 1998

Permit approving a 5 year renewal of the facility operating and closure of the western portion of the North Unit was issued May 31, 2002



## Illinois Environmental Protection Agency

1021 North Grand Avenue East, P.O. Box 19276, Springfield, Illinois 62794-9276

Mary A. Gade, Director

217/524-3300

June 18, 1998

CERTIFIED MAIL P 344 292 427

Winnebago Reclamation Service, Inc. Attention: Gary L. Marzorati Post Office Box 2071 Loves Park, Illinois 61103

Re: 2018080001 -- Winnebago County
Pagel's Pit/Winnebago Reclamation Service
Permit No. Permit No. 1991-138-LF
Modification No. 6
Log No. 1998-001
Expiration Date: April 15, 2003

Permit File

Dear Mr. Marzorati:

Permit is hereby granted to Winnebago Reclamation Service, Inc., as owner and operator, approving modification of an existing municipal and non-hazardous special waste landfill all in accordance with the application and plans certified by David S. Vladic, P.E. signature dated February 13, 1998, pursuant to 35 Illinois Administrative Code, Subtitle G (hereinafter 35 IAC) Section 813.201. Final plans, specifications, application, and supporting documents, as submitted and approved, shall constitute part of this permit and are identified in the records of the Illinois Environmental Protection Agency (the "Illinois EPA"), Bureau of Land, Division of Land Pollution Control by the permit number and log number designated in the heading above.

In issuing Modification No. 6 to Permit No. 1991-138-LF, the Illinois EPA is conditionally approving a renewal of Permit No. 1991-138-LF, pursuant to 35 IAC Part 813 Subparts B and C, and is also approving or accepting the following:

- A. Updated closure/post closure care plans and cost estimates (Revised Total Cost Estimate: \$4,090,121.00);
- B. A revision to the methods used to construct the final cover system;
- C. Revisions to the design of the surface water drainage system and final contours of the northern unit; and

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D. An acceptance report documenting that approximately 16.6 acres of final cover have been applied to the western portion of the northern unit and that in this 16.6 acre area the appurtenances associated with closure (i.e., surface water control structures and gas and leachate extraction devices) have also been installed.

The permit application (Log No. 1998-001) for Modification No. 6 to Permit No. 1991-138-LF consists of the following documents:

DOCUMENT	DATE OF DOCUMENT	DATE RECEIVED
Original Application for Log No. 1998-001	December 30, 1997	January 2, 1998
Revised LPC-PA1	January 14, 1998	January 15, 1998
Addendum providing the Acceptance Report for the Final Cover and an LPC-PA1 with notarized signatures	February 19, 1998	February 23, 1998
Extension of Due Date to May 1, 1998	April 1, 1998	April 3, 1998
Additional Information proposing revised closure/post-closure care cost estimates	April 3, 1998	April 3, 1998
Additional Information regarding final cover and closure/post-closure care cost estimates	May 11, 1998	May 14, 1998

Except for the differences described in the table below, the special conditions of the permit letter for Modification No. 6 to Permit No. 1991-138-LF are identical to the special conditions to Modification No. 5.

Condition No. in Modification No. 5	Condition No. in Modification No. 6	Description of Modification
П.6	II.6	Modified to reference changes to the final cover system approved by Modification No. 6 (Log No. 1998-001).